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*Counsel to the Plan Administrator  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11  
:  
Gawker Media LLC, *et al.*,<sup>1</sup> : Case No. 16-11700 (SMB)  
:  
Debtors. : (Jointly Administered)  
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**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER  
BETWEEN THE PLAN ADMINISTRATOR AND THE IRS  
REGARDING EXAMINATION OF GAWKER MEDIA'S  
2016 FEDERAL INCOME TAX RETURN**

**PLEASE TAKE NOTICE** that the United States of America, Department of Treasury, Internal Revenue Service (the "IRS") selected the 2016 Form 1120, U.S. Corporation Income Tax Return (the "2016 Return") filed by Gawker Media LLC ("Gawker Media") for examination pursuant to 11 U.S.C. § 505(b) (the "2016 Return Examination");

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<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

**PLEASE TAKE FURTHER NOTICE** that pursuant to 11 U.S.C. § 505(b)(2)(A)(ii), the deadline for the IRS to complete the 2016 Return Examination is September 5, 2017 (the “2016 Return Examination Deadline”);

**PLEASE TAKE FURTHER NOTICE** that following good-faith, arm’s-length negotiations between the Plan Administrator for Gawker Media and the IRS, the parties entered into the stipulation and order attached hereto as Exhibit A (the “Stipulation and Order”), extending the 2016 Return Examination Deadline by 45 days, to October 20, 2017;

**PLEASE TAKE FURTHER NOTICE** that, absent objections, the undersigned will present the Stipulation and Order for signature to the Court on **September 5, 2017 at 12:00 noon**; and

**PLEASE TAKE FURTHER NOTICE** that responses or objections to the Stipulation and Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and served so as to be actually received no later than **August 31, 2017 at 4:00 p.m.** (prevailing Eastern Time), upon (i) the Plan Administrator for the Debtors, Attn: William D. Holden ([profinvoices@gawker.com](mailto:profinvoices@gawker.com)); (ii) counsel to the Plan Administrator for the

Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) counsel for the IRS, Andrew E. Krause, United States Attorney's Office Southern District of New York, 86 Chambers Street, 3rd Floor, New York, New York 10007; and (v) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

Dated: August 18, 2017  
New York, New York

/s/ Gregg M. Galardi  
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